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## APPLIED ENVIRO-TECH INCORPORATED

February 14, 2002

Mr. Ed Boyle  
DON – Northern Division-NAVFAC  
10 Industrial Highway  
Code 182/EB- Mail Stop 82  
Lester, PA 19113-2070

Re: TAG comments on "Final Work Plan Addendum No. 02 for Subsurface Investigation at Building 41 for Remedial Investigation of IR Program Site 16", dated January 2002 at NCBC Davisville, RI

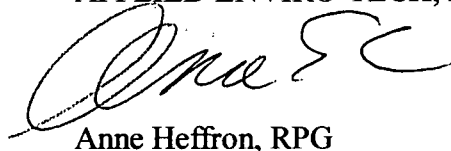
The following comments are offered on the above referenced document:

- 1) In the "Objectives and Scope" section, page 2 and 3 of 12 a discussion of the soil borings states the boring will be advanced "adjacent" to the former vapor degreasing pit and former Cosmolene tank pit. Applied Enviro-Tech, Inc. (Applied) suggests the borings should be advanced directly into the backfilled area where the degreasing pit and Cosmolene underground storage tank (UST) was located. In addition the third target area between the former Cosmolene tank pit and wells MW-16 – 14D and MW-16- 15D where CVOC has been detected should be drilled as a contingency location based on field results of the first two locations discussed. A possible location for an additional boring is the former solvent recovery still area or along the piping run to the former pump area or the leach field.
- 2) Past documents have mentioned a leach field associated with Building 41, however Figure 7 attached to the document doesn't locate a leach field. If the leach field is located along the eastern side of Building 41 this area is suggested as a potential source area. This suggestion is based on the inferred groundwater flow direction as east southeasterly.

- 3) Section 4.1 Drilling and Subsurface Soil Sampling. This section states split spoon sampling of the "overburden" will be sampled continuously. Applied assumed PID values will be recorded for each split spoon sample interval and would suggest particular attention be paid to the weathered bedrock surface if one exists in these borings and PID values recorded for this interval as well.
- 4) Section 4.12 Collection of Soil for Chemical Analysis. For the borings in the Cosmolene tank area, in the event elevated soil sample headspace values are not recorded, samples will be selected for confirmatory analysis based on staining and/or odor, as headspace readings in this area are not likely. In addition, the proposed analysis identified is for Volatile Organic Compounds (VOC's) via EPA Method 8260. Cosmolene is unlikely to be detected by this methodology. Although it is understood the objective of the workplan is to determine the source of the TCE plume. The effects of a commingled plume could be significant and is suggested that an attempt is made to analyze for a release of Cosmolene by an appropriate methodology.
- 5) If possible Applied suggest obtaining a select sample of the weathered bedrock surface if it exists in these boring locations for contaminant characterization.

Please call me at (401) 792-8260 if you have any further questions.

Sincerely,  
APPLIED ENVIRO-TECH, INC.



Anne Heffron, RPG

CC: Dexter Miller  
Christine Williams  
Richard Gottlieb